




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

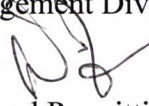
11201 Renner Boulevard  
Lenexa, Kansas 66219

NOV 21 2018

**MEMORANDUM**

**SUBJECT:** Statement of Basis for the Corrective Measures proposed for the RV Hopkins Site,  
Davenport, Iowa

**FROM:** Bruce Morrison, Project Manager   
RCRA Corrective Action and Permits Section  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

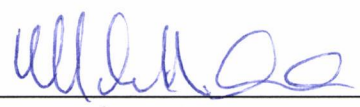
**THRU:** Don Lininger, Chief   
Waste Remediation and Permitting Branch  
Air and Waste Management Division

**TO:** Mark A. Smith, Acting Director  
Air and Waste Management Division

Attached for your review and approval is a Statement of Basis for the RV Hopkins site located in an industrial area of Davenport, Iowa. The site encompasses approximately seven acres and is currently being used for scrap metal collection and recycling.

Past site investigations identified soil and groundwater contaminated with volatile organic compounds and lead in soil and groundwater. Recent interim corrective measures were completed that removed all remaining wastes and capped lead-contaminated soil. There are no drinking water wells impacted or threatened by the contamination associated with the site. The attached Statement of Basis proposes to establish and record an Environmental Covenant to restrict the site from being used for residential development and require maintenance of a soil cap placed on lead-contaminated soils.

The Statement of Basis, which has been peer reviewed in CNSL, has a more detailed discussion of the past investigations and their findings. Upon your approval of the Statement of Basis, copies of the complete Administrative Record will be delivered to the Davenport Public Library and a public notice with a 30-day comment period will be issued. If you have any questions, please contact me at (913) 551-7755.

  
\_\_\_\_\_  
Approved

11/21/18  
\_\_\_\_\_  
Date

Attachments

RCRA



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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

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**STATEMENT OF BASIS**

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**RV Hopkins Facility**  
EPA ID # IAD022096028  
Davenport, Iowa

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|                            |   |
|----------------------------|---|
| <b>Facility/Unit Type:</b> | Inactive drum recycling facility                                  |
| <b>Contaminants:</b>       | Lead, volatile organic compounds, semi-volatile organic compounds |
| <b>Affected Media:</b>     | Soil, groundwater   |
| <b>Proposed Remedy:</b>    | Property activity and use limitations/land use controls           |

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**INTRODUCTION**

This Statement of Basis describes the proposed corrective measures (the proposed final remedy) for the former RV Hopkins, Inc. site, also known as the former Quad City Drum Recycling site. The RV Hopkins site is located at 743 Schmidt Road, Davenport, Iowa. (Figure 1). The supporting basis for the proposed final remedy is also presented.

The U.S. Environmental Protection Agency Region 7 is issuing this Statement of Basis as part of its public participation responsibilities under the Resource Conservation and Recovery Act.

This document highlights the information that is presented in more detail in the site Administrative Record. The information includes the Resource Conservation and Recovery Act Facility Assessment and other site investigation documents. The EPA encourages the public to review these documents for a more complete understanding of the environmental issues at this facility and the final corrective action activities that are proposed. The Administrative Record locations are noted at the end of this document.

**PROPOSED FINAL REMEDY**

The proposed final remedy for the RV Hopkins site consists of the implementation of institutional controls that will limit future use and activity at the site. Activity and use limitations will provide protectiveness through restricting site uses which may result in exposures. These limitations will prohibit residential development and require the characterization and appropriate management of any materials that are excavated whenever areas of contaminated soil on the site are disturbed.



## **FACILITY BACKGROUND**

RV Hopkins and Quad City Drum Recycling operated as a drum reconditioning/recycling facility from 1964 to sometime in 2012. Drum reconditioning consisted primarily of washing, shot blasting, and repainting metal 55-gallon drums. A RCRA Facility Assessment completed in 1993 identified a total of 12 Solid Waste Management Units that consisted of waste storage areas, bag houses, a furnace, and storm water drainage and storage areas.

Multiple environmental investigations have been performed since 1982 to determine the extent of releases to the environment at the site, including soil and groundwater. The following table identifies the historical maximum concentration of hazardous constituents of concern in the soil and compares them to EPA's Regional Screening Levels for industrial soils.

| Media | Contaminant of Concern | Maximum Concentration (mg/kg) | Regional Screening Level <sup>1</sup> (mg/kg) | Remediation Goal (mg/kg) |
|-------|------------------------|-------------------------------|---|--------------------------|
| Soil  | Aroclor 1254           | 29                            | 0.97  | 0.97                     |
| Soil  | Aroclor 1260           | 3.65                          | 0.99  | 0.99                     |
| Soil  | Arsenic                | 19                            | 3   | 3                        |
| Soil  | Dieldrin               | 0.17                          | 0.14  | 1.4                      |
| Soil  | Lead                   | 60,000                        | 800   | 800                      |

<sup>1</sup> The screening levels are the USEPA regional screening levels of November 2017 based on industrial exposure to soils, assuming an excess lifetime cancer risk of  $1 \times 10^{-6}$  and a hazard index of 1.

The following table identifies the historical maximum concentration of hazardous constituents in groundwater and compares them to drinking water standards, also referred to as Maximum Contaminant Levels.

| Media       | Contaminant of Concern (µg/L) | Maximum Concentration (µg/L) | MCL (µg/L) | Remediation Goal (µg/L) |
|-------------|-------------------------------|------------------------------|------------|-------------------------|
| Groundwater | Arsenic                       | 86                           | 10         | 10                      |
| Groundwater | Barium                        | 2,400                        | 2,000      | 2,000                   |
| Groundwater | Cadmium                       | 21.7                         | 5          | 5                       |
| Groundwater | Chlordane                     | 15                           | 2          | 2                       |
| Groundwater | Chromium                      | 340                          | 100        | 100                     |
| Groundwater | Lead                          | 23,000                       | 15         | 15                      |
| Groundwater | Trichloroethene               | 9                            | 5          | 5                       |
| Groundwater | Vinyl chloride                | 10                           | 2          | 2                       |

All tanks, drums, and waste piles were removed from the facility by Quad City Drum Recycling in accordance with an approved site closure plan. Interim corrective measures were completed in 2018 that included the placement of a soil cap on areas where lead exceeded the EPA regional screening level for industrial soil.

## **SUMMARY OF FACILITY RISKS**

A Human Health Risk Assessment was not prepared for this facility. Also, an Ecological Risk Assessment was not prepared for this facility because it is located in an industrial area that does not



provide suitable habitat for potential ecological receptors. Interim corrective measures previously performed have removed all drummed wastes, tanks, and waste piles. Lead-contaminated soils have been capped with clean soil. The institutional control for the facility will restrict the site property from future residential development and will require that the soil cap be maintained in a manner that will prevent human exposure.

## **EVALUATION OF THE PROPOSED FINAL REMEDY**

For any corrective measure alternative evaluated for implementation as a final remedy, detailed documentation must be provided on how the potential remedy will satisfy the EPA's three "General Standards for Corrective Measures." These three corrective measures standards are identified as "*Overall Protection of Human Health and the Environment*," "*Attainment of Media Cleanup Standards*," and "*Control the Sources of Releases*." The proposed final remedy for the RV Hopkins facility meets the standard for overall protection of human health and the environment because the EPA has determined that the previously performed interim measures that removed all hazardous wastes in conjunction with soil capping and property activity and use restrictions will be protective of human health and the environment. The inspection and maintenance of the soil cap in conjunction with land use restrictions prohibiting future residential development at the facility will adequately control the source of potential release and attain media cleanup standards, which for this site would be the continued containment of contaminated soil with controls that prevent exposure and off-site migration of waste constituents.

Corrective measure alternatives must also be evaluated using the seven balancing criteria for evaluating clean-up options of *Short-Term Effectiveness*; *Long-Term Reliability and Effectiveness*; *Reduction of Toxicity, Mobility, or Volume of Wastes*; *Implementability*; *Cost*; *Community Acceptance*; and *State Acceptance*. The proposed final remedy will be effective in the short-term, as the property activity and use restrictions can be implemented in a relatively short time period. The proposed remedy will be effective in the long term due to the provisions for routine maintenance of the capped soils and the implementation of land use restrictions for as long as the waste remains in place. Property activity and use restrictions are readily implementable and relatively affordable components of a corrective measures final remedy. In conclusion, the proposed remedy provides a reasonable approach to meeting the remediation goals identified above.

## **PUBLIC PARTICIPATION**

The EPA solicits input from the public on the proposed remedy for the RV Hopkins site. The EPA will make a final remedy decision for the facility only after the public comment period has ended and all comments have been reviewed and responded to in writing. The EPA may modify the proposed final remedy or select another remedy based upon new information or comments received from the public during the public comment period.

The EPA has set a public comment period from \_\_\_\_\_ to \_\_\_\_\_ to encourage public participation in the final remedy selection process. A notice will be published in the Quad-City Times that the Statement of Basis and supporting documents are available for review. If requested, a public availability session will be held to allow the public an opportunity to discuss the proposed final remedy with the EPA representatives. A public hearing will be scheduled, if requested by the public and accompanied by a statement of issues to be raised in the hearing, at which the EPA will receive both oral

and written comments. The Administrative Record, where the public may review the Statement of Basis and other relevant documents, is available at the following locations:

U.S. Environmental Protection Agency Region 7  
Records Center  
11201 Renner Boulevard  
Lenexa, Kansas 66219

Davenport Public Library  
321 North Main Street  
Davenport, Iowa 52801-1490  
(563) 326-7832

**CONTACT:**

U.S. Environmental Protection Agency Region 7  
Attn: Bruce Morrison  
Lenexa, Kansas 66219  
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Email: [morrison.bruce@epa.gov](mailto:morrison.bruce@epa.gov)



R.V. Hopkins – Former Quad City Drum  
EPA ID# IAD022096028 Facility Boundary



**Legend**

 RV Hopkins Facility

